

Presentment Date and Time: May 22, 2013 at 12:00 noon (Prevailing Eastern Time)
Objection Deadline: May 22, 2013 at 11:30 a.m. (Prevailing Eastern Time)

JONES DAY
222 East 41st Street
New York, New York 10017
Telephone: (212) 326-3939
Facsimile: (212) 755-7306
Jayant W. Tambe
Laura W. Sawyer

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----x
In re: : Chapter 11
: Case No. 08-13555 (JMP)
LEHMAN BROTHERS HOLDINGS INC., *et al.*, :
Debtors. : (Jointly Administered)
:
-----x

**NOTICE OF PRESENTMENT OF CLAIMS LITIGATION SCHEDULE FOR THE
OBJECTION OF DEBTORS AND DEBTORS IN POSSESSION TO CLAIMS
OF WASHINGTON STATE TOBACCO SETTLEMENT AUTHORITY**

PLEASE TAKE NOTICE that the undersigned will present the annexed Claims
Litigation Schedule for the Objection of Debtors and Debtors in Possession to Claims of
Washington State Tobacco Settlement Authority (the “Claims Litigation Schedule”) to the
Honorable James M. Peck, United States Bankruptcy Judge, for signature on **May 22, 2013 at**
12:00 noon (Prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed Stipulated Scheduling Order, with proof of service, is served and filed with the Clerk of the Court and a courtesy copy is delivered to (i) the Bankruptcy Judge's chambers and (ii) the undersigned, so as to be received by **May 22, 2013 at 11:30 a.m. (Prevailing Eastern Time)**, the Stipulated Scheduling Order may be signed.

Dated: May 15, 2013
New York, New York

Respectfully submitted,

/s/ Benjamin Rosenblum
Jayant W. Tambe
Laura W. Sawyer
Benjamin Rosenblum
JONES DAY
222 East 41st Street
New York, New York 10017
Telephone: (212) 326-3939
Facsimile: (212) 755-7306

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----x
In re: : Chapter 11
:
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : Case No. 08-13555 (JMP)
:
Debtors. : (Jointly Administered)
-----x

**CLAIMS LITIGATION SCHEDULE FOR THE OBJECTION OF DEBTORS
AND DEBTORS IN POSSESSION TO CLAIMS OF WASHINGTON
STATE TOBACCO SETTLEMENT AUTHORITY**

This Claims Litigation Schedule for the Objection of Debtors and Debtors in Possession to Claims of Washington State Tobacco Settlement Authority [Docket No. 19888] (the “Washington TSA Objection”), submitted in accordance with the Order Pursuant to Section 105 of the Bankruptcy Code, Bankruptcy Rule 9014, and General Order M-390 Authorizing the Debtors to Implement Claims Hearing Procedures and Alternative Dispute Resolution Procedures for Claims Against Debtors, entered April 19, 2010 [Docket No. 8474] (the “Claims Procedures Order”), is adopted by this Court as the Claims Litigation Schedule for the Washington TSA Objection.

1. All fact discovery shall be completed by March 17, 2014.
2. The parties are to conduct discovery in accordance with the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure (as incorporated therein), and the Local Rules of this Court. In accordance with Federal Rules of Bankruptcy Procedure 9014 and 7026, Federal Rules of Civil Procedure 26(a)(2) and 26(a)(3) shall apply to this contested matter. The following interim deadlines may be extended by the written consent of the parties without application to the Court, provided all fact discovery is completed by the date set forth in paragraph 1 above:

- A. Initial requests for production of documents may be served no later than June 10, 2013.
 - B. Initial document productions must be made no later than September 15, 2013.
 - C. Privilege logs must be produced no later than October 1, 2013.
 - D. Initial expert discovery requests must be served by October 11, 2013.
 - E. Washington TSA's expert report(s) must be served no later than December 16, 2013.
 - F. Depositions of fact witnesses must be completed no later than December 17, 2013.
 - G. Depositions of Washington TSA expert(s) must be completed no later than January 17, 2014.
 - H. The Debtors' expert report(s) must be served no later than February 3, 2014.
 - I. Depositions of the Debtors' expert(s) must be completed no later than February 17, 2014.
 - J. Washington TSA's rebuttal expert report(s), if any, must be served no later than March 3, 2014.
- 3. Dispositive motions, if any, must be filed no later than April 17, 2014.
 - 4. A pre-merits hearing conference shall be held at a date to be determined by the Court after April 17, 2014.
 - 5. The merits hearing shall be held at a date to be determined in accordance with the Claims Procedures Order and after April 17, 2014.

Dated: May 15, 2013
New York, New York

/s/ Laura W. Sawyer

Jayant W. Tambe
Laura W. Sawyer
Benjamin Rosenblum
JONES DAY
222 East 41st Street
New York, New York 10017
Telephone: (212) 326-3939
Facsimile: (212) 755-7306

*Attorneys for the Debtors and
Debtors in Possession*

Dated: May 15, 2013
New York, New York

/s/ Eric T. Moser

Robert N. Michaelson
Eric T. Moser
RICH MICHAELSON MAGALIFF MOSER, LLP
340 Madison Avenue, 19th Floor
New York, New York 10173
Telephone: (212) 220-9402
Facsimile: (212) 913-9642

*Attorneys for Washington State
Tobacco Settlement Authority*

Dated: May ___, 2013
New York, New York

SO ORDERED

UNITED STATES BANKRUPTCY JUDGE